

**THE ROSEN LAW FIRM, P.A.**

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*Counsel for Lead Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ETIENNE BALON, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiff,

vs.

AGRIA CORPORATION, GUANGLIN  
LAI, XIE TAO, JOHN FULTON, and  
WAH KWONG TSANG,

Defendants.

No.: 2:16-cv-08376-SDW-LDW

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR AN  
AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND AWARD TO LEAD  
PLAINTIFFS**

Hon. Susan D. Wigenton

**PLEASE TAKE NOTICE** that pursuant to the Court's Text Order entered on October 27, 2017 (Dkt. # 31), on December 12, 2017, at 11:00 a.m., or as soon thereafter as counsel may be heard, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 5C, Newark, NJ, 07101, before the Honorable Susan D. Wigenton, United States District Judge, Lead Plaintiffs Etienne Balon and Xiao Ming Zhou, through their undersigned Counsel, will move for an order: (i) awarding attorneys' fees; (ii) awarding reimbursement of litigation expenses, and (iii) approving a compensatory award to Lead Plaintiffs.

The motion is based on the Memorandum of Law in Support; the Declaration of Laurence Rosen in Support of Final Approval of Settlement and Award of Attorneys' Fees and Expenses, and the exhibits thereto; the Stipulation of Settlement filed June 30, 2017 and the exhibits thereto (Dkt. #25-1); and all other pleadings and matters of record and such additional evidence or arguments as may be presented at the hearing.

Dated: November 7, 2017

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence Rosen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of November, 2017 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen  
Laurence Rosen